Chris Kitchel, OSB No. 81212 ckitchel@stoel.com Leta E. Gorman, OSB No. 98401 legorman@stoel.com STOEL RIVES LLP 900 SW Fifth Avenue, Suite 2600 Portland, OR 97204

Telephone: (503) 224-9429 Facsimile: (503) 220-2480

Attorneys for Defendants Farmers Group, Inc., Farmers Insurance Exchange, Farmers Insurance Company, Inc. and Farmers Insurance Company of Oregon

UNITED STATES DISTRICT COURT DISTRICT OF OREGON

LAURA KLEIN,

Civil No. 02-CV-1451-HU

Plaintiff,

V.

FARMERS GROUP, INC., a California corporation; FARMERS INSURANCE EXCHANGE, INC., a California corporation; FARMERS GROUP OF COMPANIES, a California corporation; FARMERS INSURANCE COMPANY, a California corporation; FARMERS INSURANCE OF OREGON, a California corporation; JOHN McHALE, an individual; and A through J Corporations, inclusive,

Defendant.

AFFIDAVIT OF LETA E. GORMAN IN SUPPORT OF UNOPPOSED MOTION TO DISMISS DEFENDANT FARMERS GROUP OF COMPANIES

Page 1 - AFFIDAVIT OF LETA E. GORMAN IN SUPPORT OF UNOPPOSED MOTION TO DISMISS DEFENDANT FARMERS GROUP OF COMPANIES

STATE OF OREGON)
) ss
County of Multnomah)

I, Leta E. Gorman, being first duly sworn, do depose and state:

- 1. I am an attorney with the firm of Stoel Rives LLP, counsel for defendants Farmers
 Group, Inc., Farmers Insurance Exchange, Inc., Farmers Insurance Company, and Farmers
 Insurance of Oregon in the above-captioned matter.
- 2. In plaintiff's Complaint and First Amended Complaint, plaintiff names the entity Farmers Group of Companies, a California corporation, as a defendant.
 - 3. Farmers Group of Companies is not now, nor has it ever been, a legal entity.
- 4. Attached as Exhibit A to this affidavit is a June 11, 2003 letter from Elizabeth A. McKanna, counsel for plaintiff, agreeing to the dismissal of this entity defendant.

Leta E. Gorman, OSB O. 98401

SUBSCRIBED AND SWORN TO before me this 17th day of June, 2003.

OFFICIAL SEAL
KEVIN P MC KENZIE
NOTARY PUBLIC-OREGON
COMMISSION NO. 354025
MY COMMISSION EXPIRES APRIL 6, 2006

My Commission Expires: 4-4-3004

McKanna	Bishop	Joffe	Attorneys
---------	--------	-------	-----------

John S. Bishop, II Elizabeth A. Joffe Aruna A. Masih* Elizabeth A. McKanna Dana L. Sullivan*c

*Also admitted in Washington Also admitted in California

June 11, 2003

Leta Gorman Stoel Rives, LLP 900 SW Fifth Avenue, Suite 2600 Portland OR 97204

Re:

Laura Klein v. Farmers Insurance, et al.

MBJ File No. 4566

Dear Leta:

In response to your letter of June 9, 2003, we are willing to dismiss defendant Farmers' Group of Companies based on your representation that that designation does not refer to any legal entity in existence now or at any relative time to this matter.

Sincerely,

MCKANNA BISHOP JOFFE

Elizabeth A. McKanna

EAM:If

F:\McKanna\Kiein 4565\Gorman letter.wpd

CC:

Laura Klein

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2003, I served a copy of the within AFFIDAVIT OF

LETA E. GORMAN IN SUPPORT OF UNOPPOSED MOTION TO DISMISS

DEFENDANT FARMERS GROUP OF COMPANIES by electronic service through the U.S.

District Court of Oregon CM/ECF system, and by depositing in the United States Post Office at

Portland, Oregon, a full, true and correct copy thereof addressed to the following attorney of
record:

Elizabeth A. McKanna McKANNA BISHOP JOFFE 851 SW Sixth Avenue, Suite 1625 Portland, OR 97204 Via CM/ECF & U.S. Mail

Attorneys for Plaintiff

John J. McHale PO Box 2153 Blue Bell, PA 19422 Via U.S. First-Class Mail

Pro Se

DATED: June 17, 2003.

STOEL RIVES LLP

Chris Kitchel, OSB No. 81212 Leta E. Gorman, OSB No. 98401

Telephone: (503) 224-9429 Facsimile: (503) 294-9170 E-mail: ckitchel@stoel.com E-mail: legorman@stoel.com

Attorneys for Defendants Farmers Group,
Inc., Farmers Insurance Exchange, Farmers
Insurance Company, Inc. and Farmers
Insurance Company of Oregon